

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

William A. Newsom

Plaintiff,

v.

Stanley W. Taylor, et al.

Defendant.

Civil Action No. 05-673 GMS

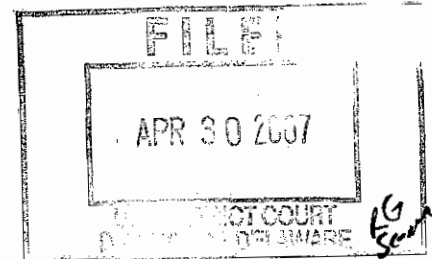
DECLARATION FOR ENTRY OF DEFAULT

William A. Newsom, hereby declares:

I am the plaintiff herein. The complaint herein was filed on September 15, 2005.

The court record and files show that the plaintiff served the attorney's for First Correctional Medical with a request for Discovery and Interrogatories in December 2006. These discovery request were somewhat filed prematurely by the plaintiff due to waiting for the court to lift the stay of proceedings that the plaintiff requested due to spinal surgery that had to be performed. The plaintiff filed the stay of proceedings on August 14, 2006. The plaintiff then updated the court and asked for the stay of proceedings to be lifted on November 17, 2006. The stay of proceedings was not officially lifted until December 19, 2006, shortly after the plaintiff's filing the request for Discovery and Interrogatories.

When the defendant's attorney did not respond to plaintiff's request within the time frame permitted by the Federal Rules of Civil Procedure, plaintiff filed a Motion For Default Judgement on February 15, 2007. The court characterized the plaintiff's Motion for Default



Judgement through their e-filing service as a second request for interrogatories and notified defendants attorney of such.

Defendants attorney of record, Dana Spring Monzo, esq., filed a letter with the court on February 27, 2007 requesting a sixty (60) day extension to answer plaintiff's discovery request.

The defendants attorney of record, Dana Spring Monzo, esq. has failed to answer plaintiff's discovery request prior to as well as after her request of a sixty (60) day extension.

Defendants as well as their attorney are not in the military service and are not infants or incompetents. For this foregoing reason the plaintiff respectfully request this honorable court to enter default judgement in his favor.

I declare under the penalty of perjury that the foregoing is true and correct. Executed at the Delaware Correctional Center in Smyrna, Delaware on April 27, 2007

Submitted this 27 day of April, 2007.

William A. Newsom

William A. Newsom SBI#257317
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

Certificate of Service

I, William A. Newsom hereby certify that I have served a true and correct copy(ies) of the attached Declaration for Entry of Default upon the following parties/persons:

To: Dana Spring Monzo, esq.

1225 N. King St., Suite 1100

P.O. Box 397

Wilmington, Delaware 19899

To: Eileen Kelly, esq.

Carvel State Building

820 N. French St.

Wilmington, Delaware 19801

To:

To: Office of the Clerk

United States District Court

844 N. King St., Lockbox 18

Wilmington, Delaware 19801

To:

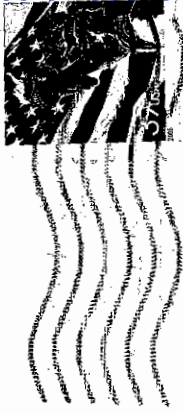
To:

BY PLACING IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correction Center, Smyrna, DE 19977.

On this 27 day of April, 2007

William A. Newsom

William A. Newsom SBI#257317



SOUTH JERSEY NJ 080
28 APR 2007 PM 11 L

IM WILLIAM A. NEWSOM
SBI# 257317 UNIT T-2/BED18

DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

U.S. DISTRICT COURT
ATTN: PETER DALEO
844 N. KING ST.
LOCKBOX 18
WILMINGTON, DELAWARE

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